

Amy L. Alvarez
District Manager
Federal Government Affairs

Suite 1000 1120 20th Street, NW Washington DC 20036 202-457-2315 FAX 202-263-2601 email: alalvarez@att.com

August 6, 2002

Ms. Marlene H. Dortch Secretary Federal Communications Commission 445 12th Street, SW, Room TWB-204 Washington, DC 20554

Re:

<u>Application by Owest Communications International, Inc. for Authorization to Provide In-Region InterLATA Services in the States of Colorado, Idaho, Iowa, Nebraska and North Dakota, Docket No. 02-148</u>

Application by Owest Communications International, Inc. for Authorization to Provide In-Region InterLATA Services in the States of Montana, Utah, Washington and Wyoming, Docket No. 02-189

Dear Ms. Dortch:

On Monday, August 5, 2002, David Lawson, Richard Rocchini, Mark Schneider, and the undersigned, all representing AT&T, met with John Rogovin, Linda Kinney, Richard Welch, James Carr, Sharon Diskin, and Paula Silverthaw of the Office the General Counsel and Carol Mattey and Michelle Carey of the Wireline Competition Bureau. The purpose of this meeting was to discuss the impact in the above-referenced proceedings of Qwest's secret, unfiled interconnection agreements. In particular, AT&T explained that the Qwest applications should be rejected for at least three independent reasons: (1) because Qwest has not made the discriminatory secret deal terms available to other CLECs, it cannot satisfy its checklist burden to demonstrate that it is presently providing nondiscriminatory access to unbundled network elements, (2) Qwest's claim that it is presently providing nondiscriminatory access to OSS rests upon the results of KPMG tests that are not representative of Qwest's real world performance, because they relied upon the performance Qwest provided to CLECs that received special treatment, not available to other CLECs, pursuant to the secret, unfiled agreements; indeed, even KPMG refused to find that those test results were "representative of the 'typical' CLEC experience"; and (3) because key secret deals CLECs that were most active in Qwest's region agreed not to participate in state or federal section 271 proceedings, the record on other non-OSS

issues is also not representative of Qwest's real world performance. The arguments made were consistent with AT&T's written comments in the above-referenced proceedings.

One electronic copy of this Notice is being submitted to the Secretary of the FCC in accordance with Section 1.1206 of the Commission's rules.

Sincerely, amyfalvarez

cc:

Michelle Carey
Michael Carowitz
James Carr
Sharon Diskin
Linda Kinney
Carol Mattey
Janice Myles
Gary Remondino
John Rogovin
Paula Silverthaw
Richard Welch
Elizabeth Yockus